

**Exhibit 1**

**Stipulation**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

	X	
In re:	:	Chapter 11
	:	
EXIDE HOLDINGS, INC., <i>et al.</i> ,	:	Case No. 20-11157 (CSS)
	:	
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	
	:	<b>Re: Docket Nos. 350, 789, 808, 840, 878, 900, 926 &amp; 987</b>

**STIPULATION AND AGREEMENT TO  
FURTHER EXTEND CHALLENGE DEADLINE FOR  
GOVERNMENTAL AUTHORITIES AND CREDITORS' COMMITTEE<sup>2</sup>**

The Debtors, the Consenting Creditors, the Creditors' Committee, and the United States on behalf of the Environmental Protection Agency and the California Department of Toxic Substances Control, the Georgia Environmental Protection Division of the Department of Natural Resources, Indiana Attorney General, Louisiana Department of Environmental Quality, Mississippi Department of Environmental Quality, Commonwealth of Pennsylvania Department of Environmental Protection, South Carolina Department of Health and Environmental Control, Tennessee Attorney General & Reporter, and Texas Commission on Environmental Quality (collectively, the "Governmental Authorities" and, together with the Debtors, the Creditors' Committee and the Consenting Creditors, the "Parties"), through their respective counsel enter into this *Stipulation and Agreement to Further Extend Challenge Deadline for the Governmental*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are Exide Holdings, Inc. (5504), Exide Technologies, LLC (2730), Exide Delaware LLC (9341), Dixie Metals Company (0199), and Refined Metals Corporation (9311). The Debtors' mailing address is 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

<sup>2</sup> Capitalized terms used but not defined herein shall have the respective meanings ascribed to them in the *Final Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief* [Docket No. 350] (the "Final DIP Order").

*Authorities and Creditors' Committee* (the "Stipulation") and hereby stipulate and agree as follows:

1. The Parties agree and stipulate, in accordance with paragraph 25(e) of the Final DIP Order, that the Challenge Deadline is hereby further extended from October 22, 2020 to October 23, 2020 solely for the Governmental Authorities and the Creditors' Committee.

2. Nothing herein shall preclude any of the Governmental Authorities or the Creditors' Committee from seeking further extensions of the Challenge Deadline for cause as provided in the Final DIP Order, nor shall any provision of this Stipulation modify or abridge any application of the Bankruptcy Code and Bankruptcy Rules (including Local Rule 9006-2) to any such request for further extensions of the Challenge Deadline. To the extent any of the Governmental Authorities seek such further extensions of the Challenge Deadline, nothing herein shall prevent or preclude any Party from opposing such request.

3. The Parties have agreed that pursuant to the DIP Order the extension of the Challenge Deadline is effective between the Parties on the terms set forth herein without entry of the Order.

[SIGNATURE PAGES FOLLOW]

Dated: October 21, 2020  
Wilmington, Delaware

Respectfully submitted,

/s/ Robert Britton

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